

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Jacqueline Mars,)	Case No. 3:21-cv-_____
)	
Plaintiff,)	Hon.
)	
v.)	<u>NOTICE OF REMOVAL</u>
)	
Dana, Inc.,)	Meghan Anderson Roth (0082165)
)	MARSHALL & MELHORN, LLC
Defendant.)	Four SeaGate, 8th Floor
)	Toledo, Ohio 43604
)	(419) 249-7100
)	FAX (419) 249-7151
)	roth@marshall-melhorn.com
)	Counsel for Defendant
)	Dana, Inc.
)	

1. On August 30, 2021, Defendant Dana, Inc. (“Dana”) received a Summons and Complaint captioned *Jacqueline Mars v. Dana, Inc.*, Case No.: CI-0202102854, pending in the Common Pleas Court of Lucas County.

2. Copies of the Summons and Complaint are attached as Exhibits A and B.

3. This Notice of Removal is filed within 30 days after receipt of the Summons and the Complaint by the Defendant who has been served and is therefore timely filed in accordance with 28 U.S.C. §1446(b).

4. The Summons and Complaint represent all process, pleadings and orders served upon Defendant in this case.¹

5. This Court has original jurisdiction over this action because Plaintiff alleges violations of federal law including that Defendant violated the Americans with Disabilities Act, 42 U.S.C. §§ 12101, *et seq.* (paragraphs 240-262), violated Title VII of the Civil Rights Act of 1964 42 U.S.C. § 20003-3(a) (paragraphs 253 – 274), and violated the Family and Medical Leave Act of 1993, 29 U.S.C. § 2615(a) (paragraphs 275 – 280). Therefore this action may be removed to this Court pursuant to 28 U.S.C. §§1331 and 1446.

6. A copy of this Notice of Removal will be filed with the Clerk of the Court for the Common Pleas Court of Lucas County and served upon Plaintiff's counsel.

WHEREFORE, Defendant respectfully requests that this matter proceed in this Court as though originally commenced herein.

Respectfully submitted,

Meghan Anderson Roth (0082165)

/s/ Meghan Anderson Roth

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Counsel for Defendant
Dana, Inc.

¹ Plaintiff filed a First Amended Complaint on the same date as the original Complaint, but Dana, Inc. has not been served with a copy of the First Amended Complaint.

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2021, a copy of the foregoing was filed electronically. Parties may access this filing through the Court's system.

/s/ Meghan Anderson Roth
Counsel for Defendant